ATTACHMENT 10: PERSONNEL TRAINING PROGRAM

PERSONNEL TRAINING PROGRAM

prepared for:
EOG DISPOSAL, INC.
MILWAUKEE, WISCONSIN

prepared by:
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SEPTEMBER 1994

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Section 1
INTRODUCTION

EOG Disposal, Inc. (EOG) is committed to providing a safe, clean and comfortable working environment for its employees. The purpose of this training program is to prevent personal injury, property damage and environmental degradation arising from the release of hazardous waste into the environment.

EOG's Personnel Training Program is designed to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment and emergency systems, including:

- Procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment;
- Communications and alarm systems;
- Shutdown of operations.

Training at EOG is an ongoing process. This training program has been established to make facility employees aware of the hazards in the work place, and how to conduct work in a safe manner. EOG is committed to a safe work place, safe environment and a safe community.

1.1 Objective

The management of hazardous wastes in an environmentally sound manner is a complex and difficult operation involving specialized apparatus and personal protective equipment. Personnel must understand waste management processes, the hazards that might be encountered, and the regulations that govern waste management operations. The objective of this program is to give EOG personnel this knowledge through a combination of classroom instruction and hands on experience.

Section 2

PERSONNEL TRAINING PROGRAM

The EOG Personnel Training Program is designed in accordance with the regulatory requirements of WAC NR 630.16. This program is used for teaching facility personnel material and waste management procedures (including Contingency Plan implementation) relevant to the positions in which they are employed.

There are established, comprehensive training programs for all levels of employees. These programs train each employee how to perform their duties in a safe manner. Hazardous waste management concepts have been incorporated into these training programs in order to insure compliance with the requirements.

Qualified instructors, trained in hazardous waste management procedures, conduct training sessions using:

- classroom lectures, and
- on-the-job training

Classroom lectures are the most effective method for group training. Classroom training include study manuals, visual presentations, and problem solving related to facility operation. Sufficient time for question-and-answer periods and testing is planned so that the participants have an opportunity to clearly broaden and demonstrate their knowledge.

On-the-job training is utilized whenever practical. The processing supervisor is responsible for ensuring that all new employees learn correct procedures; perform them accurately, reliably, and efficiently; and make safety awareness a part of their duties. On-the-job training techniques include performing tasks after an initial briefing, having the employee complete the task, and evaluating the results.

No employee is allowed to perform unsupervised work at the facility until after successfully completing the introductory training program.

All employees at the EOG facility are trained in both introductory and job-specific training programs for materials and waste management. These programs are designed to provide training for specific duties according to job function and job classification. The training program covers emergency response, so that employees are adequately prepared, as duties may dictate, to respond quickly and safely to various emergency situations. All employees annually undergo a training review. New employees assigned to the processing facility or to a new position at the facility begin the program immediately and are fully trained within six months. EOG personnel may not work in unsupervised positions until they have completed both classroom instruction and on-the-job training pertaining to their specific job duties.

2.1 Introductory Training

The introductory training program is designed to introduce new employees to the company and to operations at the facility, including hazardous waste management. All employees undergo an 8-hour introductory training session. This introduction is completed as expeditiously as possible, within at least two months of employment. Introductory training includes lectures, lesson examinations, a facility tour, hands-on training, booklets and manuals.

This training helps to ensure that the facility personnel are able to respond effectively to emergencies by familiarizing them with plant emergency procedures, emergency equipment, facility communication, and alarm systems. The instructor also gives guidance on procedures used in inspecting, repairing, and shutting down operations in case of emergencies.

2.2 Supplemental Training

Additional training session may be utilized as needed to define the handling problems associated with specific chemicals and the requirements for transporting, packaging, and processing materials on the job.

Classes are also conducted for appropriate facility personnel on:

- Proper driving and use of forklifts;
- Proper use and maintenance of fire extinguishers and fire fighting equipment;
- Repair and maintenance of material-handling equipment;
- Inspection of facilities and emergency and monitoring equipment;

- Proper use, repair, and maintenance of facility emergency and monitoring equipment;
- Proper use of the alarm system;
- Spill cleanup, and
- Basic first aid and cardiopulmonary resuscitation (CPR).

2.3 Annual Training Review

The annual training program at EOG is designed to meet job-specific training needs according to job duties. All employees will be required to participate in the annual training program review to maintain proficiency, to learn new techniques and procedures, to become familiar with new regulatory requirements, and to reinforce safety and quality consciousness.

2.4 Drills

EOG's drill program is designed to test employees on their emergency response reactions and the timelines of response. Drills are also used to assess the response of the emergency coordinators and the emergency response team. Drills are performed on different shifts and under simulated emergency situations.

After a drill, an assessment is performed as to the response of all involved. If necessary, a general meeting is held with the employees to discuss the results and take any action necessary to improve performance.

2.5 Specialty Training

This training consists of short courses on specific subjects such as Permit-Required Confined Space Entry, Labeling, Hazardous Materials Handling, etc. The purpose of these courses if to address the specific needs of individual job assignments.

These training courses are also used to give employees a more in-depth study of certain generic subjects such as First Aid & CPR, Emergency Response, fire fighting, Fork Lift training, Emergency Procedures, and experienced and new members to (re)learn the techniques necessary to control and response to an emergency.

2.6 Training Documentation

EOG will maintain training records on current personnel until closure of the facility. Records of former employees are also maintained at the facility and kept for three years from their last date of employment.

The following documents and records are maintained at the facility:

- Employee name and job title for each position at the waste recycling management facility;
- Written job description of each position, including the requisite skill, education, and other qualifications necessary, and the duties of facility personnel assigned to the position;
- Written description (with dates) of the type and amount of both introductory and continuous training provided to each person; and
- Records which document employee training and/or job experience required by this program.

2.7 Training Program

All EOG employees are required to be trained for their job-specific activities. No individual is allowed to work in a position until they have successfully completed the elements of the training program applicable to his/her specific position. In addition, all employees are required to participate in the annual review of the training program.

All new processing employees are required to undergo an introductory 8-hour training session to introduce the company, operations at the facility, and materials handled at the facility. This orientation is completed during the first six months of employment.

2.8 Emergency Response Training

Comprehensive specialized training is provided so that each individual at the facility is adequately prepared to response quickly and safely to various emergency situations. Each person is required to become familiar with the facility's Contingency Plan. Emergency training includes:

- Identifying duties of the Emergency Coordinator, alternates and others;
- Discussing the types of emergency situations that could occur at the facility;

- Reviewing emergency communication systems and evacuation procedures;
- Identifying primary and alternative evacuation routes;
- Identifying the location of emergency equipment: alarms, first-aid stations, eye-wash stations, fire fighting equipment, etc.

Following the classroom lecture on the general Contingency Plan training, each individual is tested in specific duties and responsibilities related to an emergency situation in the area. Emergency response training also include discussion of chemical properties of the materials handled and the selection of proper fire extinguishers for various types of fires.

2.9 Management Training Responsibilities

The Training Manager is responsible for teaching employees about facility materials and waste management procedures (including Contingency Plan implementation) relevant to their positions. He/she is required to review and update the training programs at lease once every six months. The trainer is assisted by the Processing Supervisor who is responsible for facility safety instruction. Currently, the Facility Manager fulfills the duties of the Training Manager.

The Processing Manager is responsible for ensuring that all individuals are trained in accordance with the requirements of this training program. This person assists in developing the training program content and format.

Section 3
JOB TITLES AND DESCRIPTIONS

Personnel at EOG carry out either administrative and/or operational functions or both. The administrative personnel receive introductory and annual review training with emphasis on record/keeping requirements, as shown in the training outlines.

Operating personnel at EOG are instructed in materials and waste management procedures according to their job classifications. The following subsections describe and identify job classifications and duties associated with the positions at the facility.

3.1 Waste Coordinator

The waste coordinator is the customer's link to the waste facility and the facilities contact with other waste facilities. All paperwork for incoming material flows through the waste coordinator so it can be tracked and processed according to the waste approval procedure. Paperwork for waste being sent for recycling or disposal from the facility is the responsibility of the waste coordinator. Approvals for outgoing wastes are secured and approvals for incoming are relayed to the customer by the waste coordinator. The scheduling of incoming and outgoing waste shipments is handled by the waste coordinator. Requirements for a waste coordinator include:

- B.S. in chemistry or related field or equivalent experience.
- Knowledge of regulations including RCRA and HMTA.
- Knowledge of waste analysis, disposal technologies, and waste facilities.
- Experience in customer relations.
- Excellent communication skills.
- Knowledge of computer systems operation.

3.2 Operations/Facility Manager

The facility manager oversees all aspects of the facility operation. Waste approval, operational procedures, safety, training and liaison with customers, personnel and regulatory agencies are the responsibility of the facility manager. The facility manager coordinates incoming waste shipments, processing schedules and outgoing waste shipments. Financial, personnel and regulatory concerns

are handled by the facility manager. Facility record keeping and compliance must be maintained by the facility manager.

Requirements for a facility manager include:

- B.S. in chemistry or related field.
- Extensive experience in the hazardous waste industry.
- Extensive knowledge of regulations including RCRA, OSHA, HMTA.
- Extensive knowledge of chemical hazards and reactivity.
- Knowledge of first aid and emergency response.
- Experience with permitting and working with regulatory agencies.

3.3 Processing Supervisor

The processing supervisor directly oversees all activities within the storage and processing area. The completion of all projects and work schedules assigned by the facility manager are the responsibility of the processing supervisor. The processing supervisor ensures that all safety rules and operating procedures are followed by all process workers at all times and that each worker has adequate on-the-job training for the tasks assigned. Facility inspections are conducted by the processing supervisor, recorded and relayed to the facility manager. Incoming shipments are inspected and sampled by the processing supervisor and his staff. Requirements for a process supervisor include:

- H.S. education with some college preferred.
- Experience in worker supervision.
- Experience with equipment used at the facility.
- Basic knowledge of chemistry and waste regulations.
- Familiarity with computers.

3.4 Processing Technician

Processing technicians are responsible for completing tasks assigned by the processing supervisor in a safe and timely manner. Correct use, care and operation of equipment is expected. Safety rules and operating procedures must be followed at all times. Reporting of any unsafe working conditions, violations of operational procedures or equipment failures is the responsibility of all process technicians. Process technicians will occasionally pick up materials from customer locations and are expected to conduct themselves in a professional and personable manner. Trained process

technicians will be expected to assist the Laboratory Chemist in the analysis of samples. Requirements for a processing technician include:

- H.S. education.
- Familiarity with equipment used at the facility.
- Valid drivers license.

3.5 Receptionist/Computer Operator

The receptionist/computer operator will handle all secretarial duties at the facility. These duties include switchboard control, data entry, word processing, report creation, travel arrangements and customer reception. The computer operation and report creation will require training to learn all aspects of the facility operation. Requirements for a receptionist/computer operator include:

- H.S. education.
- Knowledge of computer.
- Experienced typist.
- Excellent communications skills.

3.6 Laboratory Chemist

The Laboratory Chemist will be responsible for all analyses performed at the facility. The analyses include all these mentioned in the facility waste analysis plan. Documentation and record keeping of analytical data and samples is the responsibility of the laboratory chemist. The laboratory chemist is expected to perform pilot studies on specific waste streams to determine recycling alternatives. All work performed by the laboratory chemist is directed by the facility manager. Requirements for a laboratory chemist include:

- A.S. in chemistry minimum with B.S. preferred.
- Knowledge of basic analytical procedures and tests.
- Working knowledge of all lab equipment.
- Excellent communication skills.
- Knowledge of computer systems operation.

Appendix A

INTRODUCTORY TRAINING PROGRAM OUTLINE

INTRODUCTORY TRAINING PROGRAM OUTLINE

1. Complete Physical

2. Complete Facility Tour

3. Copy of Organizational Chart

4. Company Policy Guides

   A. Facility Operations
   B. Maintenance
   C. Decontamination of Equipment and Personnel

5. Manifesting Guide

6. General Safety Guide for Facility Maintenance, Processing, Shipping, Receiving, Laboratory Personnel, and Drivers

   A. Personnel Protective Clothing and Equipment
   B. Health Effects
   C. Physical Safety

7. Nature and Characteristics of Materials and Waste

8. Overview of Federal and State Rules and Regulations

9. Transportation of Waste

10. Review of Facility's Contingency Plan

    A. Communication System
    B. Evacuation Procedures
    C. Location of Emergency Response Equipment
    D. Location of Utility Shutoffs

11. Handling, Inspection and Compliance related to permit requirements.

Appendix B

TRAINING FOR ADMINISTRATIVE PERSONNEL

TRAINING FOR ADMINISTRATIVE PERSONNEL

1. General company policies and procedures
2. Facility operations orientation
3. Company organization, department functions, personnel and personnel roles
4. Safety equipment awareness and operation
5. Fire protection and control
6. Emergency procedures, including communication and evacuation routes
7. Recordkeeping requirements

Appendix C

PROCESS PERSONNEL TRAINING PROGRAM OUTLINE

PROCESS PERSONNEL TRAINING PROGRAM OUTLINE

1. Personnel Safety Training

    A. Physical/chemical characteristics of wastes
    B. Health effects
    C. Protective clothing and equipment

2. Release Prevention and Response

    A. Contingency Plan
    B. Emergency response and evacuation

3. Decontamination Procedures

4. New regulations, developments and techniques applicable to waste handling, recycling, treatment and transportation

5. Facility operation

    A. Using and inspection emergency systems and monitoring equipment
    B. Container Management
    C. Tank Management
    D. Proper operation of vehicles and process equipment
    E. Preventative maintenance
    F. Shutdown of operations

6. Waste analysis

    A. Waste Material Data Sheets
    B. Material Safety Data Sheets
    C. Sample collection
    D. Screening Procedures
    E. Recordkeeping

ATTACHMENT 11

ATTACHMENT 11: CLOSURE PLAN

CLOSURE PLAN FOR
EOG DISPOSAL, INC.
MILWAUKEE, WISCONSIN

prepared for:
EOG DISPOSAL, INC.
MILWAUKEE, WISCONSIN

prepared by:
RMT, INC.
WAUKESHA, WISCONSIN

SEPTEMBER 1994

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Appendix A Closure Cost Estimate

Section 1
INTRODUCTION

1.1 Background

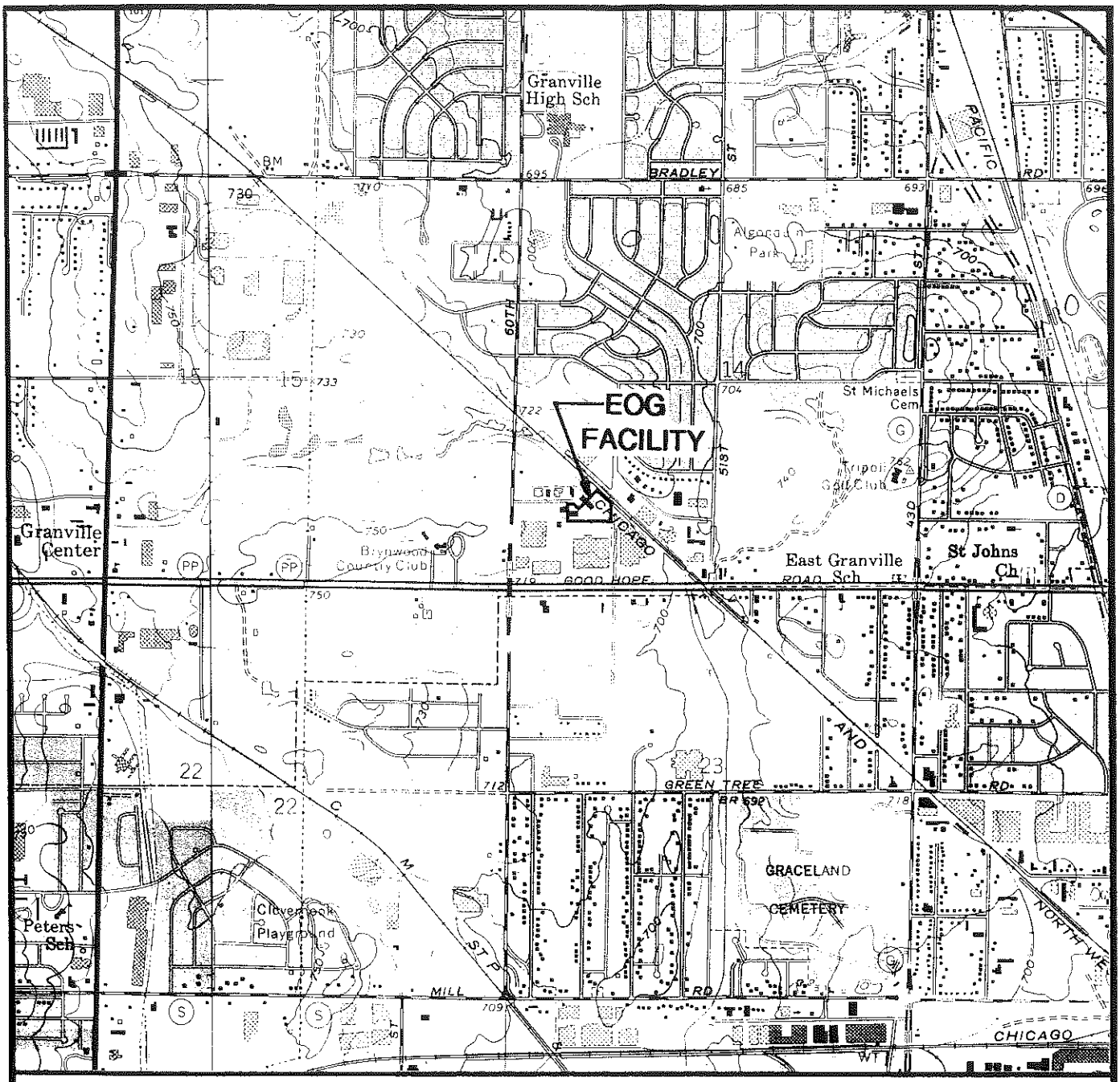
EOG Disposal, Inc. (EOG), is currently applying for an Operation license for a hazardous waste storage facility in order to conduct exempt hazardous waste recycling activities. The EOG facility is located at 5611 West Hemlock Street, Milwaukee, Wisconsin. EOG occupies approximately 2.5 acres in an area where the immediately surrounding land is used for industrial purposes. The facility includes the existing transfer facility building and an undeveloped vacant lot to the east. The location of the facility is shown on Figure 1.

In June 1990, EOG Environmental, Inc., commenced solid waste transfer operations at this facility. EOG Environmental was granted a solid waste facility operating license on July 8, 1992, by the Wisconsin Department of Natural Resources (WDNR). Later in July 1992, EOG Environmental, Inc., transferred its license to EOG Disposal, Inc.

On September 1, 1992, the WDNR adopted the Toxicity Characteristic (TC) Rule adding 25 constituents to the list of eight metals, four pesticides, and two herbicides already regulated under Subtitle C of RCRA. Because of the TC rule, some of the solid wastes which EOG is permitted to manage may now be classified as hazardous waste. EOG applied for and was issued an interim license for a hazardous waste storage and treatment facility on March 15, 1994. This closure plan fulfills, in part, the requirements of Chapter NR 640.16 and NR 645.17, Wisconsin Administrative Code, for a Feasibility and Plan of Operation license.

1.2 Purpose and Scope

The purpose of this Closure Plan is to describe the closure activities that EOG will perform to close the Milwaukee facility. The plan is intended to fulfill the closure plan requirements in Chapters NR 680.21 and 685.05, Wisconsin Administrative Code. The plan describes the key activities, tests, and performance standards for closing the EOG facility on West Hemlock Street.



STATE LOCATION

0 2000 4000

SCALE: 1"=2000'

N

SITE LOCATOR MAP

EOG DISPOSAL, INC.
MILWAUKEE, WI

SOURCE: BASE MAP FROM MENOMONEE FALLS, WI
7.5 MINUTE USGS QUADRANGLE DATED 1958,
PHOTOREVISED 1976 AND THIENSVILLE, WI
7.5 MINUTE USGS QUADRANGLE DATED 1958,
PHOTOREVISED 1976.

RMT INC.

DWN. BY:	DKJ
APPROVED BY:	THD
DATE:	JULY 1994
PROJ. #	3057.01
FILE #	30570186

FIGURE 1

The scope of this document is limited to providing a Closure Plan for the hazardous waste tank management unit and hazardous waste container management units at the EOG-Milwaukee Transfer facility. The Closure Plan includes the following:

- Descriptions of the facility and storage areas
- The technical approach that will be used to accomplish closure of the storage areas
- Analytical parameters and performance standards for determining closure, including the method that will be used to establish background levels
- Methods for performing and documenting closure
- Health and Safety issues related to closure activities
- Estimated closure costs and financial assurance
- Decontamination methods for personnel and for equipment used to handle contaminated materials during closure
- Documentation of closure activities

Section 2

GENERAL FACILITY INFORMATION

2.1 Facility Name, Location, and Contact

NAME: EOG Disposal, Inc.

LOCATION: 5611 West Hemlock Street
Milwaukee, WI 53223

CONTACT: Michael C. Vilione
President
414-353-1156

EPA ID: WID 988580056

2.2 Site Description and Overview of Waste Management Units

Figure 1 shows the location of the EOG facility in Milwaukee, Wisconsin. Sheet 2 shows the locations of the hazardous waste management units on the site. The facility includes the following hazardous waste units:

- Drum management areas:

  The first drum management area currently has the capacity to store a maximum of 720 drums (39,600 gallons) of hazardous waste and 1,440 drums (79,200 gallons) of nonhazardous waste or any combination of the above. This area is located inside the process/storage building and consists of approximately 7,000 (not including offices) square feet (see Sheet 9). After completion of the expanded facility, this drum management area will have the capacity to store a maximum of 1,136 drums (62,480 gallons) and a 2,000-gallon blending tank of hazardous wastes or 2,272 drums (124,960 gallons) of nonhazardous waste or any combination of the above and will consist of approximately 14,300 (not including offices) square feet (see Sheet 10).

  The second drum management area will have the capacity to store a maximum of 149 drums or approximately 8,195 gallons of acidic, basic, ignitable, reactive, and oxidizers and two 5,500-gallon above ground storage tanks or approximately 11,000 gallons of acidic and basic materials. This area

is proposed in a new building located northeast of the process/storage building and will consist of approximately 2,100 square feet (see Sheet 11).

- Tank management area:

  The tank management area is proposed to consist of four carbon steel, 12,000 gallon above ground storage tanks or approximately 48,000 gallons. This tank farm area will be located east of the process/storage building (see Sheet 12). The tank farm area (including the loading/unloading pad) will consist of approximately 2,600 square feet.

2.3 Waste Characterization

Table 1 contains a list of the hazardous waste codes that the facility can accept. This list includes both liquid and solid wastes received from industries, commercial establishments, small businesses, educational facilities, and other institutions.

2.4 Maximum Waste Inventory

EOG shall remove all containers of hazardous waste and all pumpable hazardous waste from the container management and tank management areas prior to closure. At the time of closure, only waste residues shall remain at the facility, primarily as non-pumpable residues. These residues shall be removed during implementation of the Closure Plan.

As required by Chapter NR 685.05(2)(c), this Closure Plan shall include the maximum waste inventory of hazardous waste ever on-site during the active life of the facility. Based on the known capacities of the facility's hazardous waste management units, the maximum waste inventory is estimated at a total of 131,675 gallons of hazardous waste from the container and tank storage areas and 120 cubic yards of bulk solid hazardous waste.

TABLE 1
HAZARDOUS WASTES ACCEPTED AT EOG

D001	D012	D023	
D002	D013	D024	D034
D003	D014	D025	D035
D004	D015	D026	D036
D005	D016	D027	D037
D006	D017	D028	D038
D007	D018	D029	D039
D008	D019	D030	D040
D009	D020	D031	D041
D010	D021	D032	D042
D011	D022	D033	D043
F001	F008	F022	F032
F002	F009	F023	F034
F003	F010	F024	F035
F004	F011	F025	F037
F005	F019	F026	F038
F006	F020	F027	F039
F007	F021	F028	
K001	K030	K066	K110
K002	K031	K069	K111
K003	K032	K071	K112
K004	K033	K073	K113
K005	K034	K083	K114
K006	K035	K084	K115
K007	K036	K085	K116
K008	K037	K086	K117
K009	K038	K087	K118
K010	K039	K088	K123
K011	K040	K090	K124
K013	K041	K091	K125
K014	K042	K093	K126
K015	K043	K094	K131
K016	K044	K095	K132
K017	K045	K096	K136
K018	K046	K097	K141
K019	K047	K098	K142
K020	K048	K099	K143
K021	K049	K100	K144
K022	K050	K101	K145
K023	K051	K102	K147
K024	K052	K103	K148
K025	K060	K104	K149
K026	K061	K105	K150
K027	K062	K107	K151
K028	K064	K108	
K029	K065	K109	

TABLE 1
HAZARDOUS WASTES ACCEPTED AT EOG

P001	P030	P063	P096
P002	P031	P064	P097
P003	P033	P065	P098
P004	P034	P066	P099
P005	P036	P067	P101
P006	P037	P068	P102
P007	P038	P069	P103
P008	P039	P070	P104
P009	P040	P071	P105
P010	P041	P072	P106
P011	P042	P073	P107
P012	P043	P074	P108
P013	P044	P075	P109
P014	P045	P076	P110
P015	P046	P077	P111
P016	P047	P078	P112
P017	P048	P081	P113
P018	P049	P082	P114
P020	P050	P084	P115
P021	P051	P085	P116
P022	P054	P087	P118
P023	P056	P088	P119
P024	P057	P089	P120
P026	P058	P092	P121
P027	P059	P093	P122
P028	P060	P094	P123
P029	P062	P095	

TABLE 1
HAZARDOUS WASTES ACCEPTED AT EOG

U001	U063	U125	U186
U002	U064	U126	U187
U003	U065	U127	U188
U004	U066	U128	U189
U005	U067	U129	U190
U005	U068	U130	U191
U006	U069	U131	U192
U007	U070	U132	U193
U008	U071	U133	U194
U009	U072	U134	U196
U010	U073	U135	U197
U011	U074	U136	U200
U012	U075	U137	U201
U014	U076	U138	U202
U015	U077	U139	U203
U016	U078	U140	U204
U017	U079	U141	U205
U018	U080	U142	U206
U019	U081	U143	U207
U020	U082	U144	U208
U021	U083	U145	U209
U022	U084	U146	U210
U023	U085	U147	U211
U024	U086	U148	U212
U025	U087	U149	U213
U026	U088	U150	U214
U027	U089	U151	U215
U028	U090	U152	U216
U029	U091	U153	U217
U030	U092	U154	U218
U031	U093	U155	U219
U032	U094	U156	U220
U033	U095	U157	U221
U034	U096	U158	U222
U035	U097	U159	U223
U036	U098	U160	U225
U037	U099	U161	U226
U038	U101	U162	U227
U039	U102	U163	U228
U041	U103	U164	U230
U042	U105	U165	U231
U043	U106	U166	U232
U044	U107	U167	U233
U045	U108	U168	U234
U046	U109	U169	U235
U047	U110	U170	U236
U048	U111	U171	U237
U049	U112	U172	U238
U050	U113	U173	U239
U051	U114	U174	U240
U052	U115	U176	U242
U053	U116	U177	U243
U055	U117	U178	U244
U056	U118	U179	U246
U057	U119	U180	U247
U058	U120	U181	U248
U059	U121	U182	U249
U060	U122	U183	U328
U061	U123	U184	U353
U062	U124	U185	U359

Section 3

CLOSURE PERFORMANCE STANDARDS

3.1 Objectives

EOG intends to close the RCRA hazardous container management area in a manner that satisfies Chapter NR 685.05(1), Wisconsin Administrative Code. To accomplish this, the regulations indicate that EOG shall do the following:

- Minimize the need for further maintenance.
- Control, minimize, or eliminate to the extent necessary to protect human health and the environment, and to prevent the post-closure escape of hazardous wastes or hazardous constituents.

These requirements shall be satisfied by documenting the following:

- Concrete surfaces, tank interiors, and other structures associated with the hazardous waste management systems or structures have been decontaminated or dismantled, and decontamination rinsate samples meet the performance standards described in this closure plan.
- Residues generated during facility decontamination and closure activities have been managed as described in this Closure Plan.

In general, closure activities shall follow the approach presented in the following section.

3.2 Closure Approach

Closure activities will likely take place in stages after removal of all waste materials—decontamination of the storage units, and sampling and analysis of the decontamination rinsate. Final methods, sequencing, and staging shall be determined by closure personnel. In general, closure activities shall consist of the following:

- Buildings and associated structures that may have been in contact with hazardous waste or hazardous constituents shall be decontaminated. Decontamination shall generally involve power-washing using wash and rinse liquids. Some structures and associated electrical components shall be physically scraped, brushed, or hand-washed rather than power-washed due to the sensitivity of the equipment for power-washing.
- Tanks, piping and associated structures that may have been in contact with hazardous waste or hazardous constituents shall also be decontaminated. Decontamination shall generally involve removing any residual sludges from

the structures and power-washing using wash and rinse liquids. Some structures and associated electrical components shall be physically scraped, brushed, or hand-washed rather than power-washed due to the sensitivity of the equipment for power-washing.

- Following decontamination of buildings, tanks, and associated structures, other areas which potentially contacted hazardous waste shall be decontaminated.

Specific closure activities for the various hazardous waste management units are described in Section 4 of this Closure Plan.

3.3 Performance Standard for Decontamination

The container management and tank management areas shall be decontaminated primarily by power-washing. Decontamination rinsate samples shall be collected and analyzed as described in Section 4 and in Appendix A. Laboratory results shall be compared to the following regulatory concentrations, and decontamination shall be complete when these concentrations are achieved:

- Public drinking water Maximum Contaminant Level (MCL) as promulgated in 40 CFR 141 for inorganics, and 40 CFR 141.12 for organics.
- If a MCL has not been established, the Maximum Contaminant Level Goal (MCLG) as promulgated in 40 CFR 141.30, shall then be used.
- If neither a MCL nor a MCLG has been established, 1.0 mg/L shall be used as the clean-closure standard for decontamination. (Note, if the MCL or MCLG is less than the constituent's analytical reporting limit, the reporting limit shall then be used as the clean-closure standard.)

Table 2 contains a list of the constituents of concern for the container and tank management areas final decontamination rinsates.

Table 2
CONSTITUENTS OF CONCERN FOR THE TANK MANAGEMENT AREA
AND CONTAINER MANAGEMENT AREA CONTAMINATION RINSATES

VOLATILE ORGANIC COMPOUNDS		
Acrolein	1,2-Dichloropropane	Tetrachloroethylene
Acrylonitrile	1,3-Dichloropropylene	Toluene
Benzene	1,1-Dichloroethane	trans-1,2-Dichloroethylene
Bromoform	1,2-Dichloroethane	1,1,1-Trichloroethane
Carbon tertrachloride	1,1-Dichloroethylene	1,1,2-Trichloroethane
Chlorobenzene	Ethylbenzene	Trichloroethylene
2-Chloroethylvinyl ether	Methyl bromide	Vinyl chloride
Chloroform	Methyl chloride	
Dichlorobromomethane	1,1,2,2-Tetrachloroethane	
ACID EXTRACTABLE COMPOUNDS		
2-Chlorophenol	2,4-Dinitrophenol	Pentachlorophenol
2,4-Dichlorophenol	2-Nitrophenol	Phenol
2,4-Dimethylphenol	4-Nitrophenol	2,4,6-Trichlorophenol
4,6-dinitro-o-cresol	p-Cloro-m-cresol	
BASE/NEUTRAL EXTRACTABLE COMPOUNDS		
Acenaphthene	Hexachlorobutadiene	2-Chloronaphthalene
Acenaphthylene	Hexachlorocyclopentadiene	4-Chlorophenyl phenylether
Anthracene	Hexachloroethane	Chrysene
Benzidine	Indeno(1,2,3-cd)pyrene	Dibenzo(a,h)anthracene
Benzo(a)anthracene	Isophorone	1,2-Dichlorobenzene
Benzo(a)pyrene	Naphthalene	1,3-Dichlorobenzene
Benzo(b)fluoranthracene	Nitrobenzene	1,4-Dichlorobenzene
Benzo(ghi)perylene	N-Nitrosodimethylamine	3,3-Dichlorobenzidine
Benzo(k0fluoranthene	N-Nitrosodi-n-propylamine	Diethyl phthalate
bis(2-Chloroethoxy)methane	N-Nitrosodiphenylamine	Dimethyl phthalate
bis(2-Chloroethyl)ether	Phenanthrene	Di-n-butyl phthalate
bis(2-Chloroisopropyl)ether	Pyrene	1,2-Diphenylhydrazine
bis(2-Ethylhexyl)phthalate	1,2,3-Trichlorobenzene	Fluoranthene
4-Bromophenyl phenylether		Fluorene
Butylbenzyl phthalate		Hexachlorobenzene

Table 2
CONSTITUENTS OF CONCERN FOR THE TANK MANAGEMENT AREA
AND CONTAINER MANAGEMENT AREA CONTAMINATION RINSATES

PESTICIDES/PCBs		
Aldrin	Dieldrin	PCB-1016
alpha-BHC	Endosulfan (I)	PCB-1221
beta-BHC	Endosulfan (II)	PCB-1232
gamma-BHC	Endosulfan sulfate	PCB-1242
delta-BHC	Endrin	PCB-1248
Chlordane	Endrin aldehyde	PCB-1254
4,4'-DDT	Heptachlor	PCB-1260
4,4'-DDE	Heptachlor epoxide	
4,4'-DDD	Toxaphene	
INORGANICS		
Arsenic	Chromium	Selenium
Barium	Lead	Silver
Cadmium	Mercury	
MISCELLANEUOS		
pH	Cyanides	Phenols

Section 4
CLOSURE METHODS

4.1 Decontamination of the Hazardous Waste Storage Units

The container management and tank management areas are shown on Sheet 2. The container management areas are located inside the buildings, with cement block walls and a concrete floor. These areas were primarily used for drummed storage and of hazardous liquids and blending of hazardous waste in a 2,000-gallon blending tank. In addition, a Roll-Off storage area located north of the lab pack building was used to store bulk quantities of solid and hazardous wastes and consists of an approximately 1,200 square foot concrete pad.

The 48,000-gallon tank farm and two 5,500-gallon above ground storage tanks make up the tank management unit. The 48,000-gallon tank farm consists of a concrete containment area and a concrete loading/unloading area located west of the lab pack building. The two 5,500-gallon above ground tanks are located in the lab pack building and consist of two concrete containment areas. These areas were primarily used to store bulk quantities of hazardous wastes and fuels.

Decontamination of the container management areas shall consist of the following:

- The concrete floor surface of the unit shall be physically scraped to remove visible residues. The solid residues shall be collected and managed as discussed in Subsection 4.2.
- The concrete floor shall be power-washed using an industrial-strength detergent and rinsed with water. The wash/rinse cycle shall be repeated as needed, but at lease once, to adequately decontaminate the units. Aqueous residues generated during the decontamination of the unit shall be collected and managed as discussed in Subsection 4.2.
- After the last wash/rinse cycle has been completed, a final rinse of the concrete floor shall be performed. Rinsate from the final rinse shall be collected and sampled. The final rinsate sample shall be laboratory-analyzed as discussed in Subsection 4.3.

Decontamination of the tank management areas shall consist of the following:

- The tank interiors, concrete floor and wall surfaces of the unit shall be physically scraped to remove visible residues. The solid residues shall be collected and managed as discussed in Subsection 4.2.

- The tank interiors, concrete floor and walls shall be power-washed using an industrial-strength detergent and rinsed with water. The wash/rinse cycle shall be repeated as needed, but at lease once, to adequately decontaminate the units. Aqueous residues generated during the decontamination of the unit shall be collected and managed as discussed in Subsection 4.2.

- After the last wash/rinse cycle has been completed, a final rinse of the concrete floor shall be performed. Rinsate from the final rinse shall be collected and sampled. The final rinsate sample shall be laboratory-analyzed as discussed in Subsection 4.3.

4.2 Residuals Management

Residues generated during decontamination of the storage units shall be collected and managed in accordance with state and federal regulations. Generator requirements shall be followed until laboratory results are available. Solid residues, equipment, or tanks for which decontamination is infeasible or impractical shall be dismantled and placed directly into drums or roll-off containers and properly labeled. The containerized waste shall be manifested and transported off-site to a permitted hazardous waste landfill or incinerator.

Personal protective equipment (i.e., Tyvek® coveralls, disposable booties, etc.) used during the decontamination activities shall be containerized and transported off-site to a permitted waste facility. Decontamination liquids, resulting primarily from power-washing activities, shall be collected, containerized, and properly labeled. Rinsate liquids shall be collected by impounding a volume of water on the surface with an impermeable barrier. Water shall be retrieved by vacuuming or pumping the ponded water into appropriate containers.

It is EOG's intent to discharge the decontamination liquids to a publicly owned treatment works (POTW) for treatment. Prior to discharging to the POTW, the containerized liquids shall be sampled for characterization in accordance with the sampling methods presented in Appendix A. These samples shall be laboratory-analyzed for compounds required by the POTW.

EOG may elect to manage the decontamination liquids as a hazardous waste, rather than dispose of the liquids at a POTW. If EOG should do so, the containerized liquids shall be manifested and transported off-site to a permitted hazardous waste facility.

All liquid residues generated from the decontamination activities shall be temporarily staged at the storage area until analytical data are reviewed and approval for disposal is received.

4.3 Confirmation Sampling

After completing the final wash/rinse cycle, a final rinse shall be performed on the tank interiors and storage areas. The final rinsate shall be collected, sampled, and analyzed. Final rinsate sampling, chain-of-custody, and preservation procedures discussed in Appendix A shall be used to collect the rinsate samples. Rinsate samples shall be collected as outlined in Table 3.

The final rinsate samples shall be laboratory-analyzed for hazardous constituents managed at the facility. The constituents of concern are listed in Table 2.

If the results of the rinsate analyses indicate that the closure performance standards described in Section 3 have been achieved, the unit shall be considered decontaminated. If results of the analyses indicate that the closure performance standards have not been achieved, the unit shall be further decontaminated and resampled.

TABLE 3
SUMMARY OF RINSATE SAMPLE COLLECTION

Unit/Area	No. of Samples	Description
Container Management Area Process/Storage Building	6	One sample of final rinse of the floor of the drum staging area. Five samples of final rinse of the floor of the drum storage area.
Container Management Area Lab Pack Building Storage	6	One sample of final rinse of the floor of the drum staging area. One sample of final rinse from the floor of each of the five drum storage conatinment areas.
Container Management Area Bulk Solids (Roll-Off) Storage	2	Two samples of the final rinse of the floor of the drum staging area.
Tank Management Area 48,000-Gallon Tank Farm	4	Three samples of final rinse of the floor of the tank containment area. One sample of final rinse from the floor of the loading/unloading area.
Tank Management Area Two 5,500-Gallon Tanks in Lab Pack Building	2	One sample of final rinse of the floor in each tank containment area.
Minimum Total	20	

Section 5
CONSTRUCTION QUALITY CONTROL

5.1 General

Qualified personnel shall be selected for implementation of the Closure Plan. As discussed in Section 11, an independent professional engineer shall observe the work conformance to the approved closure plan.

Section 7 of this Closure Plan specifies minimum health and safety requirements for closure activities. The selected personnel shall be responsible for developing a job- or site-specific health and safety plan. This health and safety plan shall be submitted for WDNR review as discussed in Section 7.

5.2 Construction Practices

During washing and rinsing activities, care shall be taken to control the dispersal of liquids. Barriers shall be placed at door openings or other locations to reduce the migration of liquids on the floor. Plastic sheeting may be used to protect sensitive equipment from water spray.

Flexibility will be allowed to sequence closure activities in the most efficient manner, consistent with the closure performance standards outlined in Section 3. Care shall be taken to avoid re-introduction of contaminated equipment, materials, or wash waters into areas already designated as clean.

5.3 Documentation

Activities in the field shall be observed by the independent professional engineer. Specific quality control tasks by the engineer shall include the following:

- Documentation of concrete and tank decontamination activities
- Collection of rinsate samples for confirmatory analyses
- Coordination of sample analyses with analytical laboratory(s)
- Rinsate data interpretation and recommendations for additional cleaning, if necessary

- Review of site conditions during cleaning operations and identification of actual or potential migration pathways of hazardous waste to the subsurface if cracks, etc., are identified

Field activities shall be documented in writing, and work not meeting the requirements of the Closure Plan shall be related to EOG. Corrections to the work which are performed to conform to the Closure Plan shall be documented.

Section 6
HEALTH AND SAFETY

Prior to starting the closure activities, a site-specific health and safety plan for closure activities shall be developed by each company involved to protect their workers on the site. This plan shall be submitted to the WDNR for review at least 30 days prior to beginning closure activities. The workers' employer shall be responsible for implementing the plan, directing the training of personnel, and for providing safety equipment and incidentals as required. At a minimum, the plan(s) shall address the following:

- Chemical and physical hazard evaluation
- Levels of protection - personal protective clothing and respiratory protection for persons performing closure activities and criteria used to downgrade or upgrade protective equipment in response to environmental changes during closure
- Air monitoring to ensure proper protective equipment for the conditions, including monitoring methods to be used
- Standard operating safety procedures
- Site control descriptions which delineate work zones, decontamination procedures for personnel and equipment, and site security measures
- Contingency plan which includes contacts and procedures for dealing with emergencies
- Medical evaluation and certification and worker training and certification

The plan shall be directed at compliance with applicable federal, state, and local requirements as a minimum. The following references shall be used to assist in the development of the site-specific health and safety plan:

- "Standard Operating Safety Guides," USEPA, November 1984, Chapter 9
- "Occupational Safety and Health Guidance Manual for Hazardous Waste Site Activities," NIOSH/OSHA/USCG/EPA, October 1985
- U.S. Department of Labor, Occupational Safety and Health Standards and Regulations, including, but not limited to, 29 CFR 1910.120, 1910.132, 1910.133(a), 1910.134, 1910.135, 1910.136, 1910.1200, and 1926, Hazardous Waste Operations and Emergency Response

Section 7
DECONTAMINATION

Specific decontamination procedures are dependent on the equipment used. These details will not be available until remediation personnel have been selected. Decontamination of personnel and equipment shall be documented by a qualified, independent engineer registered in the state of Wisconsin (or his representative). General decontamination procedures are described below.

7.1 Site Control

Access to the closure construction areas shall be restricted to personnel involved in closure activities and to authorized EOG personnel. Tape and signs identifying the closure construction areas shall be installed at access points.

7.2 Personnel Decontamination

Personnel leaving individual management units after contact with residual waste materials or accumulated rinsate shall be decontaminated consistent with OSHA 1910.120. The contractor shall be responsible for ensuring that his personnel comply with the decontamination procedures specified in OSHA 1910.120. Personnel decontamination equipment and facilities shall be located within the closure area. The exact location shall be determined by the contractor, based on logistics.

7.3 Equipment Decontamination

Construction equipment and cleaning equipment in contact with potentially contaminated structures or water shall be decontaminated prior to exiting the facility. The concrete loading/unloading area for the 48,000-gallon tank farm may be used as a decontamination area. If this area is not large enough to accommodate the largest piece of equipment or the rinsate generated during decontamination, a decontamination pad shall be constructed. The location of the decontamination pad, if it is necessary to construct one, shall be determined by the contractor, based on logistics.

Equipment shall be decontaminated by physical methods wherever possible (scraping, brushing, etc.) followed by at least three separate rinses. Water will be allowed to flow to the drain within the containment area or the constructed decontamination pad (if necessary) for collection and transport to a wastewater treatment facility.

7.4 Residuals Management

Residues and debris generated from decontamination of personnel and equipment shall be managed in accordance with state and federal regulations. Solid residues, including discarded personal protective equipment, shall be collected and placed into a waste container designated by EOG. Liquid residues shall be collected by installing temporary dikes and shall be transported to an appropriate treatment facility for treatment.

After final equipment decontamination, the decontamination area shall be double-washed and rinsed. Liquids shall be conveyed to a wastewater treatment facility for treatment as described above. Decontamination of the decontamination area shall be documented as described in Subsection 4.1.

If it is necessary to construct a decontamination pad, the pad shall be demolished after completing decontamination activities. The debris shall be transported off-site to a licensed landfill.

Section 8

CLOSURE SCHEDULE

EOG has indefinite life because it is strickly a recycling facility. EOG has an expected life of 50 years. The entire facility will operate until closure. Therefore, no partial closure is anticipated. At least 180 days prior to beginning closure activities, EOG Disposal, Inc., shall notify the WDNR in writing of its intent to close the facility.

The duration of closure construction activities is estimated to require 4 to 6 weeks, assuming 5-day work weeks. A contingency has been added to provide for possible additional re-cleaning of various units or equipment. The total time spent on construction activities, including soil sampling, is therefore estimated at 6 to 8 weeks.

The phasing and sequencing of work in specific areas is uncertain, and will depend on personnel logistics and scheduling once work has begun. EOG shall provide progress updates and shall communicate various milestones to the WDNR as work proceeds. EOG shall also inform the WDNR at least 5 working days prior to the occurrence of key events during closure.

Section 9

CLOSURE COST ESTIMATE

A summary of the estimated costs for implementing this closure plan are contained in Table 4. The cost estimate is located in Appendix A. These costs are based on the following:

- Costs for closure services are based on RMT, Inc.'s experience on similar projects.
- Costs for engineering and soil sampling services are estimated by RMT, Inc., based on the presently defined scope and their experience on similar projects.
- The unit costs for on-site cleaning tasks include the required labor, equipment, and materials for washing, rinsing, residuals handling, etc.
- A project administration cost has been applied to cover miscellaneous costs not associated with specific work tasks.
- The estimates of the volume or mass of bulk material for off-site disposal are approximate only, due to uncertainties over what can and cannot be practicably decontaminated.

TABLE 4

CLOSURE COST ESTIMATE

Closure Activities	Unit Cost	Quantity	Total ($)
Recycling/Disposal of Hazardous Waste Drum Inventory	non-responsive	1,136	$45,440.00
Recycling/Disposal of Lab-Pack Drum Inventory		145	$29,000.00
Recycling/Disposal of Bulk Liquid Hazardous Waste Inventory		61,000	$12,200.00
Recycling/Disposal of Bulk Solid Hazardous Waste Inventory		120	$7,200.00
Transportation Costs		16	$5,600.00
Storage Areas - decontaminate floor surfaces - decontaminate tank systems - rinsate analyses		 1 1 20	 $10,500.00 $5,200.00 $20,940.00
Closure-Derived Waste Management - solid residues - liquid residues		 5,000 30,000	 $5,000.00 $15,000.00
Engineering - closure observation - documentation report		 5 1	 $6,000.00 $6,000.00
10% Contingency	non-	1	$16,808.00
TOTAL			**$184,888.00**

Section 10

CERTIFICATION OF CLOSURE

An independent professional engineer registered in the state of Wisconsin (or representative) shall be present during critical closure activities.

When closure is completed, the independent engineer shall document that the waste management area has been closed in accordance with the concepts of the approved closure plan. A closure documentation report shall be submitted to the WDNR within 60 days of the completion of the closure activities.

The owner and engineer shall sign the following certification statement as required by NR 685(10):

> "I certify, under penalty of law, that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Information which supports the Closure Documentation Report and the certification shall be retained, pending approval of the Documentation Report.

Section 11

FACILITY STATUS AFTER CLOSURE

After closure of the EOG facility, no further RCRA hazardous waste activity shall be performed by EOG at this location. After all decontamination has been completed and site closure has been completed, the buildings and property may be used for other commercial or industrial business.

Section 12

REFERENCES

NIOSH/OSHA/USCG/EPA. 1985. Occupational safety and health guidance manual for hazardous waste site activities. October 1985.

USEPA. 1984. Standard operating safety guides.

APPENDIX A
CLOSURE COST ESTIMATE

RMT Inc.
OPINION OF PROBABLE COST
DPZ, 2/91
Version 4.0

PROJECT NAME:EOG DISPOSAL, INC.
PROJECT #:3057.01
LOCATION:Milwaukee, Wisconsin

TEMPLATE: COSTEST4
FILENAME: EOG01.WK1
BY: THD
DATE: 07-Sep-94

ITEM NUMBER	ITEM DESCRIPTION	UNITS	UNIT COST($)	QUANTITY	TOTAL($)	CUMULATIVE TOTAL
0.0000	HAZARDOUS WASTE				$0.00	$0.00
0.0000	CLOSURE ACTIVITIES				$0.00	$0.00
0.0000					$0.00	$0.00
1.0000	Recycling/Disposal of Inventory				$0.00	$0.00
1.1000	- drum contents	drum	non-responsive	1136	$45,440.00	$45,440.00
1.2000	- tank contents	gallon		61000	$12,200.00	$57,640.00
1.3000	- labpack contents	drum		145	$29,000.00	$86,640.00
1.4000	- Roll-Off contents	yd3		120	$7,200.00	$93,840.00
1.5000					$0.00	$93,840.00
1.6000					$0.00	$93,840.00
2.0000	Transportation Costs				$0.00	$93,840.00
2.1000	- drum contents	80 drums		14	$4,900.00	$98,740.00
2.2000	- tank contents	tanker		2	$0.00	$98,740.00
2.3000	- labpack contents	80 drums		2	$700.00	$99,440.00
2.4000	- Roll-Off contents	Roll-Off		6	$0.00	$99,440.00
2.5000					$0.00	$99,440.00
2.6000					$0.00	$99,440.00
3.0000	Storage Areas				$0.00	$99,440.00
3.1000	- decontaminate floor surfaces	LS	$	1	$10,500.00	$109,940.00
3.2000	- decontaminate tank systems	LS	$	1	$5,200.00	$115,140.00
3.3000	- rinsate analysis	each	$	20	$20,940.00	$136,080.00
3.4000					$0.00	$136,080.00
3.5000					$0.00	$136,080.00
4.0000	Engineering				$0.00	$136,080.00
4.1000	- closure observation activities	day	$	5	$6,000.00	$142,080.00
4.2000	- documentation report	LS	$	1	$6,000.00	$148,080.00
4.3000					$0.00	$148,080.00
4.4000					$0.00	$148,080.00
5.0000	Closure-Derived Waste Management				$0.00	$148,080.00
5.1000	- solid residues	pound		5000	$5,000.00	$153,080.00
5.2000	- liquid residues	gallon		30000	$15,000.00	$168,080.00
5.3000					$0.00	$168,080.00
5.4000					$0.00	$168,080.00
6.0000	10% Contingency	LS	$	1	$16,808.00	$184,888.00
*********					$0.00	$184,888.00
*********					$0.00	$184,888.00
*********					$0.00	$184,888.00
*********					$0.00	$184,888.00
*********					$0.00	$184,888.00
*********					$0.00	$184,888.00
PAGE 1 TOTAL						$184,888.00
PAGE 1 CUMULATIVE SUB-TOTAL						$184,888.00

RMT Inc.
OPINION OF PROBABLE COST
DPZ, 2/91
Version 4.0

PROJECT NAME:EOG DISPOSAL, INC.
PROJECT #:3057.01
LOCATION:Milwaukee, Wisconsin

TEMPLATE: COSTEST4
FILENAME: EOG02.WK1
BY: THD
DATE: 07-Sep-94

ITEM NUMBER	ITEM DESCRIPTION	UNITS	UNIT COST($)	QUANTITY	TOTAL($)	CUMULATIVE TOTAL
0.0000					$0.00	$0.00
0.0000					$0.00	$0.00
0.0000			non-responsive	0	$0.00	$0.00
0.0000	CLOSURE ACTIVITIES				$0.00	$0.00
0.0000	SOLID WASTE				$0.00	$0.00
1.0000	Recycling/Disposal of Inventory				$0.00	$0.00
1.1000	- drum contents	gallon		124960	$124,960.00	$124,960.00
1.2000	- tank contents	gallon		50000	$50,000.00	$174,960.00
1.4000	- Roll-Off contents	yd3		120	$7,200.00	$182,160.00
1.5000					$0.00	$182,160.00
1.6000					$0.00	$182,160.00
2.0000	Transportation Costs				$0.00	$182,160.00
2.1000	- drum contents	80 drums		0	$0.00	$182,160.00
2.2000	- tank contents	tanker		0	$0.00	$182,160.00
2.3000	- labpack contents	80 drums		0	$0.00	$182,160.00
2.4000	- Roll-Off contents	Roll-Off		0	$0.00	$182,160.00
2.5000					$0.00	$182,160.00
2.6000					$0.00	$182,160.00
3.0000	Storage Areas				$0.00	$182,160.00
3.1000	- decontaminate floor surfaces	LS		0	$0.00	$182,160.00
3.2000	- decontaminate tank systems	LS		0	$0.00	$182,160.00
3.3000	- rinsate analysis	each		0	$0.00	$182,160.00
3.4000					$0.00	$182,160.00
3.5000					$0.00	$182,160.00
4.0000	Engineering				$0.00	$182,160.00
4.1000	- closure observation activities	day		0	$0.00	$182,160.00
4.2000	- documentation report	LS		0	$0.00	$182,160.00
4.3000					$0.00	$182,160.00
4.4000					$0.00	$182,160.00
5.0000	Closure-Derived Waste Management				$0.00	$182,160.00
5.1000	- solid residues	pound	non-responsive	0	$0.00	$182,160.00
5.2000	- liquid residues	gallon		0	$0.00	$182,160.00
5.3000					$0.00	$182,160.00
5.4000					$0.00	$182,160.00
6.0000	10% Contingency	LS		1	$18,216.00	$200,376.00
*********					$0.00	$200,376.00
*********					$0.00	$200,376.00
*********					$0.00	$200,376.00
*********					$0.00	$200,376.00
*********					$0.00	$200,376.00
PAGE 1 TOTAL						$200,376.00
PAGE 1 CUMULATIVE SUB-TOTAL						$200,376.00

02-08-94

Kandy Schmit
EOG Environmental
5611 West Hemlock Street
Milwaukee, WI. 53223

Dear Kandy:

This letter is to confirm that Marine Shale Processor's will accept liquid fuels for $40.00 per 55 gallon drum from E.O.G.Environmental. Once again, thank you for considering Marine Shale Processor's for you recycling needs.

Sincerely,

Kenneth J. Weber
Regional Sales Manager

Marine Shale Processors, Inc.
9828 Highway 90 East • Morgan City, Louisiana 70380
(504) 631-3161 • 1-800-USA-MSPI

PCI

February 8, 1994

EOG Environmental, Inc.
Mr. Michael Vilione
5611 W. Hemlock Street
Milwaukee, WI 53223

Dear Mr. Vilione:

This letter is to confirm the pricing for recycling/disposal of liquid fuel type materials for EOG.

Pollution Control Industries will charge $40.00 per drum.

Very truly yours,

Dean N. Nardi
Vice President
Sales and Marketing

DNN/ksb

Pollution Control Industries
3317 Chicago Road, South Chicago Heights, IL 60411-5422
(708) 597-9500 (800) 388-7242 FAX: (708) 754-7935

APPENDIX A

SCHEDULE OF RATES

1. Contract No: 0010-94

2. Customer Name & Location: E.O.G. Environmental Inc,
5611 W Hemlock Street
Milwaukee, WI 53223

3. Scope of Service: Applicable on any shipment(s) from E.O.G.-Milwaukee, WI to P.C.I. - E. Chicago, IN.

4. Rates and charges: Shipment(s) will be rated at F/C non- $$$$$$ at no minimum weight.

No other allowances or discounts are applicable. Accessorial services, if any, will be charged at the same rate or charges as are applicable for the account of common carrier Rock Transfer & Storage, Inc.

5. Rules: Rules for common carrier Rock Transfer & Storage, Inc. will apply as published in ICC RCKS 190.

Customer must place contract number, as indicated in paragraph 1 above, on the bill of lading or shipping papers for all shipments tendered under this contract at time of tender to the carrier. Corrected instructions will be accepted only as specified by tariff ICC RCKS 190.

6. Application: non- F/C applies to T/L shipments not to exceed 45M in weight or a total of 90 drs. The non- allows for a 2 hr unloading time. Time in excess of 2 hrs. will be charged to the shipper (E.O.G. Environmental, Inc.) at a rate of $35.00/hr. with no cap. For deliveries that require notification to customer prior to delivery, there will be a $10.00 notification charge applied to the freight bill which also will be the responsiblility of the shipper.

THIS IS A RATE PROPOSAL WHICH WILL EXPIRE 30 DAYS AFTER THE EFFECTIVE DATE OF THIS CONTRACT.

SPOT TRANSPORTATION CONTRACT # 0010 -94

Contract entered into between
Rock Transfer & Storage, Inc.
7474 North Rockway Court
Milwaukee, WI 53224

Hereinafter called "Rock Transfer" and
E.O.G. Environmental, Inc.
5611 Hemlock Street
Milwaukee, WI 53223

Hereinafter called "Customer." As used herein, the terms "Rock Transfer" and "Customer" include all agents, servants and employees of said Rock Transfer and Customer.

1. Rock Transfer has authority from the Interstate Commerce Commission (ICC) as a contract carrier under permit no. MC-154255 Sub 1(p) to transport general commodities (with exceptions).

2. Customer has need for a contract carrier to provide transportation as described in paragraph 1 above.

3. For good and valuable consideration given by each party to the other, receipt of which is acknowledged and upon mutual convenants and promises which follow, the parties agree as follows:
   a. Customer agrees to tender one or more shipments to Rock Transfer. These shipments will be delivered as directed by shipper and as specified on the bill of lading. The parties agree that Rock Transfer's liability will be that of a common carrier at all times while this contract is in force.
   b. Customer agrees to pay the rates and charges specified in Appendix A within 30 days of Rock Transfer's invoice.
   c. Rock Transfer's liability will be limited to the weight of each package lost or damaged times $2.00 per pound. In no event will Rock Transfer's liability exceed the actual value of the property lost or damaged.

4. The parties agree to maintain confidentiality of information contained in or related to this contract.

5. This contract is effective on Feb. 8, 1994 and terminates on Mar. 8, 1994. Either party may terminate earlier by giving to the other one (1) day's notice in writing. Shipments picked up within the effective period of this contract will be rated under rates provided in Appendix A.

IN TESTIMONY WHEREOF, the parties hereto have caused this contract to be executed this 8th day of February, 1994.

Customer: E.O.G. Environmental, Inc.
By: Candy Schmit
Signature: X Candy Schmit
Title:

Carrier: Rock Transfer & Storage, Inc.
By: George Bogdanovich
Signature: George Bogdanovich
Title: Executive Vice President

ATTACHMENT 12

ATTACHMENT 12: PROOF OF FINANCIAL RESPONSIBILITY

ATTACHMENT 12: PROOF OF FINANCIAL RESPONSIBILITY

As presented in Attachment 11, Facility Closure Plan, closure costs for the EOG facility have been estimated to total approximately $200,376.00. This cost estimate includes performing the following closure activities:

- Off-site recycling and/or disposal of maximum permitted inventory.
- Decontamination of drum and tank storage areas including confirmation rinsate sampling and analyses.
- Off-site disposal of closure-derived residues.
- Closure observation and documentation.
- Closure certification by the owner and an independent registered professional engineer.

The EOG facility has been granted the authority to operate a solid waste transfer and processing facility under WDNR Solid Waste Facility Operation Licenses 03415 and 03386. EOG has also benn granted the authority to operate a hazardous waste storage facility under WDNR Hazardous Waste Storage Facility Interim License. In obtaining these licenses, EOG submitted a letter of credit to the WDNR totalling $151,503.00 as financial assurance for the closure of the transfer and processing facility.

A comparison between hazardous waste storage estimated closure costs and nonhazardous waste storage closure costs is presented in Table 1. The comparison includes a breakdown of specific tasks associated with each of the closures, as well as the costs for each task. As indicated in Table 1, the tasks associated with the closure of the hazardous waste storage area include the same tasks associated with the closure of the nonhazardous waste storage area, as well as additional items specific to a RCRA closure. The estimated cost differential for the two closures is $59,488.00.

TABLE 1

CLOSURE COST ESTIMATE

Closure Activities	Hazardous Waste Storage Closure Cost Estimate[1]	Nonhazardous Waste Storage Closure Cost Estimate[2]
Recycling/Disposal of Inventory	$93,840.00	$182,160.00
Transportation Costs	$5,600.00	[3]
Storage Areas - decontaminate floor surfaces - decontaminate tank systems - rinsate analyses	 $10,500.00 $5,200.00 $20,940.00	[3] NR NR
Closure-Derived Waste Management - solid residues - liquid residues	 $5,000.00 $15,000.00	 NR NR
Engineering - closure observation activities - documentation report	 $6,000.00 $6,000.00	 NR NR
10% Contingency	$16,808.00	$18,216
TOTAL	**$184,888.00**	**$200,376.00**

NOTES:

[1] Based on Closure Plan Cost Estimate (see Closure Plan, Appendix A).

[2] Based on $1.00 per gallon for disposal and transportation costs.

[3] Included in disposal of inventory unit cost.

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WDNR has clearly indicated to EOG that financial assurance for costs common to the two closures need not be duplicated. It is less clear whether separate financial assurance mechanisms need to be maintained for EOG's hazardous and nonhazardous waste management activities. Regardless, based upon the comparison of closure costs presented above, EOG shall submit a letter of credit to the WDNR for $48,873.00 (for a total of $200,376.00) upon issuance of a Construction Permit and WDNR's review and approval of the Construction Certification Report and closure cost estimate for hazardous waste storage activities.

ATTACHMENT 13

ATTACHMENT 13: LIABILITY INSURANCE

ATTACHMENT 13: LIABILITY INSURANCE

EOG submitted to the WDNR a certificate of liability insurance in accordance with WAC Chapters NR 680.21(5) and NR 685.08 on October 26, 1993. A copy of the Certificate of Insurance is enclosed.

ACORD. CERTIFICATE OF INSURANCE

ISSUE DATE (MM/DD/YY): 08/22/94

PRODUCER
HUGHES INSURANCE GROUP,INC
907 N. ELM, STE. 305
HINSDALE, IL.
60521

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW.

INSURED
EOG ENVIRONMENTAL, INC.
EOG DISPOSAL &
VK INVESTMENTS PARTNERSHIP
5611 WEST HEMLOCK STREET
MILWAUKEE, WI 53223

COMPANIES AFFORDING COVERAGE

COMPANY LETTER	A	Commerce & Industry Ins. Co.
COMPANY LETTER	B	National Union Insurance Co.
COMPANY LETTER	C	Employers Mutual Companies
COMPANY LETTER	D	American Int'l Surplus Lines Co
COMPANY LETTER	E	

COVERAGES

THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED, NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

CO LTR	TYPE OF INSURANCE	POLICY NUMBER	POLICY EFFECTIVE DATE (MM/DD/YY)	POLICY EXPIRATION DATE (MM/DD/YY)	LIMITS		
A	GENERAL LIABILITY X COMMERCIAL GENERAL LIABILITY X CLAIMS MADE [ ] OCCUR. OWNER'S & CONTRACTOR'S PROT.	GLCM3405798	08/06/94	08/06/95	GENERAL AGGREGATE PRODUCTS-COMP/OP AGGR. PERSONAL & ADV. INJURY EACH OCCURRENCE FIRE DAMAGE (Any one fire) MED. EXPENSE (Any one person)	$ $ $ $ $ $	2,000,000 1,000,000 1,000,000 1,000,000 50,000 5,000
A	AUTOMOBILE LIABILITY ANY AUTO ALL OWNED AUTOS X SCHEDULED AUTOS X HIRED AUTOS X NON-OWNED AUTOS GARAGE LIABILITY	CA2771054RA	12/11/93	12/11/94	COMBINED SINGLE LIMIT BODILY INJURY (Per person) BODILY INJURY (Per accident) PROPERTY DAMAGE	$ $ $ $	5,000,000
D	EXCESS LIABILITY UMBRELLA FORM X OTHER THAN UMBRELLA FORM	7735511	08/06/94	08/06/95	EACH OCCURRENCE AGGREGATE	$ $	1,000,000 1,000,000
C	WORKER'S COMPENSATION AND EMPLOYERS' LIABILITY	9H9-96-59-94	12/05/93	12/05/94	STATUTORY LIMITS EACH ACCIDENT DISEASE-POLICY LIMIT DISEASE-EACH EMPLOYEE	 $ $ $	 1,000,000 1,000,000 1,000,000
B	OTHER Contractors Pollution Liab.	CPL7166918	08/06/94	08/06/95	Each loss Total		1,000,000 2,000,000

DESCRIPTION OF OPERATIONS/LOCATIONS/VEHICLES/SPECIAL ITEMS
Contractors Pollution Liab. (continued):$50,000 Deductible-Claims Made Coverage
Other Coverages: Pollution Legal Liability #PLL5292741-eff.8/6/94 to 8/6/95
$1,000,000 Each Loss/$2,000,000 Total for all Losses. $50,000 Deductible
Claims Made Coverage.

CERTIFICATE HOLDER
EOG ENVIRONMENTAL, INC.
EOG DISPOSAL & VK
INVESTMENTS PARTNERSHIP
5611 WEST HEMLOCK STREET
MILWAUKEE, WI 53223

CANCELLATION
SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, THE ISSUING COMPANY WILL ENDEAVOR TO MAIL 10 DAYS WRITTEN NOTICE TO THE CERTIFICATE HOLDER NAMED TO THE LEFT, BUT FAILURE TO MAIL SUCH NOTICE SHALL IMPOSE NO OBLIGATION OR LIABILITY OF ANY KIND UPON THE COMPANY, ITS AGENTS OR REPRESENTATIVES.

AUTHORIZED REPRESENTATIVE

ATTACHMENT 14

ATTACHMENT 14: CERTIFICATIONS

ATTACHMENT 14: CERTIFICATIONS

P.E. Certification

Note: Engineering certification may be demonstrated by using the following language:

"I, JOHN A. CIMERMANCIC hereby certify that I am a registered Professional Engineer in the state of Wisconsin in accordance with ch. A-E 4, Wis. Adm. Code and that this report has been prepared in accordance with the Rules of Professional Conduct in ch. A-E 8, Wis. Adm. Code."

Signature, title and P.E. number

EOG Certification

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted, is to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Michael C. Vilione, President
EOG Disposal, Inc.

I, Gary J. Rollinger, hereby certify that I am a registered Professional Engineer in the State of Wisconsin in accordance with Ch. A-E 4, Wis. Adm. Code and that this report has been prepared in accordance with the Rules of Professional Conduct in Ch. A-E 8, Wis. Adm. Code.

Gary J. Rollinger

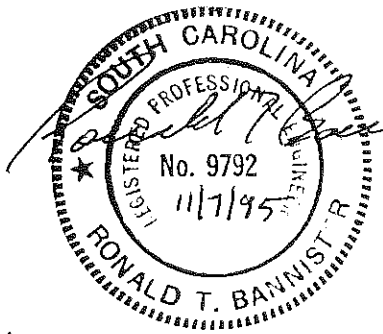
Gary J. Rollinger
Wisconsin Professional Engineer
License Number E-16989

CERTIFICATIONS NOVEMBER 10, 1995
EOG Disposal, Inc.

P.E. Certification

"I, Ronald T. Bannister hereby certify that I am a registered Professional Engineer in the State of Wisconsin in accordance with ch. A-E 4, Wisconsin Administrative Code and that this report has been prepared in accordance with the Rules of Professional Conduct in ch. A-E 8, Wisconsin Administrative Code.

Ronald T Bannister, P.E.
Signature, title and P.E. number



WISCONSIN TEMPORARY PERMIT
1791 Ronald T Bannister

EOG Certification

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted, is to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

M. C. Vilione
Michael C. Vilione, President
EOG Disposal, Inc.

State of Wisconsin \ DEPARTMENT OF REGULATION & LICENSING

Tommy G. Thompson
Governor

Marlene A. Cummings
Secretary

1400 E. WASHINGTON AVENUE
P.O. BOX 8935-8935
MADISON, WISCONSIN 53708
608 266-2112

October 30, 1995

MR RONALD BANNISTER
PO BOX 3009
HICKORY NC 28603

RE: TEMPORARY PERMIT

Dear Mr. Bannister:

Your temporary permit number is #1791. This permit is for the specific project described in your letter dated October 26.

If you sign and seal any documents using the permit, you should emboss your personal seal from your original state of registration on the document and write in below it "Wisconsin Temporary Permit #1791" and follow with your signature.

The next meeting to review applications is scheduled for January 19. If your application is complete at least fourteen (14) days prior to the meeting date it will be included on the agenda. You would be notified of the action taken within 3-4 weeks after the meeting date.

Sincerely,

BUREAU OF BUSINESS AND DESIGN PROFESSIONS

Judy Gosse. Program Assistant
Examining Board of Architects, Landscape Architects,
Professional Geologists, Professional Engineers,
Designers and Land Surveyors
(608) 267-0288

JG:s
BDP-622